



Baker & McKenzie LLP

452 Fifth Avenue
New York, NY 10018
United States

Tel: +1 212 626 4100
Fax: +1 212 310 1600
www.bakermckenzie.com

Asia Pacific

Bangkok
Beijing
Brisbane
Hanoi
Ho Chi Minh City
Hong Kong
Jakarta
Kuala Lumpur*
Manila*
Melbourne
Seoul
Shanghai
Singapore
Sydney
Taipei
Tokyo
Yangon

Europe, Middle East

& Africa
Abu Dhabi
Almaty
Amsterdam
Antwerp
Bahrain
Barcelona
Berlin
Brussels
Budapest
Cairo
Casablanca
Doha
Dubai
Dusseldorf
Frankfurt/Main
Geneva
Istanbul
Jeddah*
Johannesburg
Kyiv
London
Luxembourg
Madrid
Milan
Munich
Paris
Prague
Riyadh*
Rome
Stockholm
Vienna
Warsaw
Zurich

The Americas

Bogota
Brasilia**
Buenos Aires
Caracas
Chicago
Dallas
Guadalajara
Houston
Juarez
Lima
Los Angeles
Mexico City
Miami
Monterrey
New York
Palo Alto
Porto Alegre**
Rio de Janeiro**
San Francisco
Santiago
Sao Paulo**
Tijuana
Toronto
Washington, DC

* Associated Firm
** In cooperation with
Trench, Rossi e Watanabe
Advogados

November 16, 2023

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: General Electric Company v. Global Fiberglass Solutions of Texas, LLC
No. 23 Civ. 8346 (PKC)**

Dear Judge Castel:

We represent Plaintiff General Electric Company (“GE”) in the above-captioned case against Defendant Global Fiberglass Solutions of Texas, LLC (“GFS”). Pursuant to the Order on the Initial Pretrial Conference (the “Order”), *see* ECF No. 6, GE is scheduled to appear before the Court on November 27, 2023, at 10:00 a.m. for an initial pretrial conference (the “November 27 Conference”).

Pursuant to Rule 1(C) of the Court’s Individual Practices in Civil Cases, GE respectfully requests that the Court adjourn the November 27 Conference because GFS has failed to timely answer the Complaint, *see* ECF No. 1, despite the Court’s grant of GFS’s request for a 30-day extension to do so, *see* ECF No. 10. As a result, GE is unable to complete the requisite Joint Letter and Joint Case Management Plan with GFS, as contemplated in the Court’s Order. Based on the foregoing, GE has not consulted GFS on whether it consents to this request. GE has not previously sought an adjournment of the November 27 Conference.

For these reasons, GE respectfully request that the Court adjourn the November 27 Conference.

Sincerely,

Jacob M. Kaplan
Partner

+1 212 891 3896
Jacob.Kaplan@bakermckenzie.com

CC: Ronald Albrecht, Ph.D.
Global Fiberglass Solutions of Texas, LLC
11335 NE 122nd Way, Suite 105
Kirkland, WA 98034
ronald@globalfiberglass.com